

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DOROTHY STANLEY, AS EXECUTRIX OF	:	
THE ESTATE OF HELEN A. RUNGE,	:	
Plaintiff	:	
	:	
	:	No. 05-10849-RGS
v.	:	(Judge Stearns)
	:	
WALTER J. KELLY, et al.,	:	CIVIL ACTION
Defendants	:	JURY TRIAL DEMANDED

AMENDED LIST OF EXHIBITS TO BE OFFERED AT TRIAL

- A. Letter of Helen Runge to "To Whom It May Concern," April 30, 2003
- B. Letter of Helen Runge to Sunbridge, May 12, 2003
- C. Notes of Walter Kelly, 3 pages
- D. Sunbridge Healthcare Health and Medical Condition, Informing Residents of, Policy, June 2002
- E. Sunbridge Healthcare Psychoactive Medications Policy, June 2002
- F. Sunbridge Healthcare Refusal of Treatment Policy, June 2002
- G. Deposition of Sandra M. Porazzo-Perry, March 28, 2007.
- H. Note of Helen Runge, January 17, 2003
- I. Letter of Helen Runge to Walter Kelly, March 12, 2003
- J. Letter of Helen Runge to Dorothy Stanley, March 2003
- K. Letter of Robert M. Palmer, M.D., to Dorothy Stanley, May 12, 2003
- L. Note of B. Rhett Myers, M.D., May 30, 2003

- M. Letter of Robert M. Palmer, M.D., to Dorothy Stanley, July 25, 2003
- N. Letter of Phillip R. Feagan to Michael J. McCann and Thomas Schiavoni, June 2, 2003
- O. Packet: Invoices of Walter J. Kelly dated March 10, 2000, May 12, 2000, September 8, 2000, November 3, 2000, January 9, 2001, March 9, 2001, September 7, 2001, November 20, 2001, January 11, 2002, April 19, 2002, June 4, 2002, August 20, 2002, February 4, 2003, April 13, 2003, June 3, 2003, August 8, 2003, October 3, 2003, December 9, 2003, February 6, 2004, April 16, 2004, July 6, 2004, September 10, 2004, November 16, 2004, January 11, 2005, March 29, 2005 and May 6, 2005; Walter J. Kelly check dated June 4, 2003 (\$7,500); Pre-Bill of Walter J. Kelly dated September 25, 2003; MembersPlus check dated May 20, 2003 (\$25,000); MembersPlus check dated August 7, 2003 (\$6,500); Invoice of McGee & Schiavoni dated May 16, 2003; Walter J. Kelly check dated May 23, 2003 (\$4,227.50); Invoice of McGee & Schiavoni dated August 7, 2003; Walter J. Kelly check dated August 7, 2003 (\$6,150); Sunbridge Charges dated May 2, 2003; Walter J. Kelly check dated May 23, 2003 (\$9,475.31); Walter J. Kelly check dated June 4, 2003 (\$702.10); Statement of Account dated May 15, 2003; Invoice of Katherine F. Eddy dated May 2, 2003; Walter J. Kelly check dated May 23, 2003 (\$540); Letter of Walter J. Kelly to Michael McCann dated June 4, 2003; Walter J. Kelly check dated June 4, 2003 (\$1,900).
- P. Deposition of Farrah Seidler, May 8, 2007
- Q. Affidavit of Helen A. Runge, July 27, 2003
- R. Transcription of Videotaped Statement and Videotaped Statement of Helen A. Runge, January 16, 2004
- S. Helen Runge's Answer to Kelly's Interrogatories, October 12, 2006, and Answer to Bloomingdale's Interrogatories, October 12, 2006
- T. Affidavit of Walter J. Kelly in Support of Motion for Award of Costs in guardianship proceeding
- U. July 13, 2006, Chapter 93A demand letter
- V. August 10, 2006, response to Chapter 93A demand letter
- W. Helen Runge's medical records from Sunbridge (00001 – 00485)

- X. Photographs of Helen Runge
- Y. Massachusetts Resident Admission Agreement
- Z. 2003 Invoices of Lawrence Hale regarding defense of guardianship proceeding
- AA. October 15, 2004, January 11, 2005 and September 20, 2005 Invoices of Blake J. Godbout & Associates
- BB. March 15, 2004 Invoice of Latsha, Davis, Yohe & McKenna, P.C.
- CC. Deposition of Walter Kelly, December 1 and 14, 2006
- DD. 1992 Last Will and Testament of Helen Runge
- EE. 1994 Codicil to Last Will and Testament
- FF. 1998 Last Will and Testament of Helen Runge
- GG. 3/5/98 Durable Power of Attorney of Debra Gaughan
- HH. 02/29/00 Discharge Summary – Jewish Memorial
- II. Geraghty Associates, Inc. (Landlord) documents
- JJ. 7/21/00 MassPro Summary of Concerns
- KK. 7/28/00 MassPro Letter to Runge
- LL. 8/1/00 Letter from Runge to Kelly
- MM. 10/04/00 Letter from Runge to Kelly
- NN. 10/4/00 Runge's Appt of Kelly as Rep. for MassPRO correspondence
- OO. 10/4/00 Letter from Runge to Kelly re MassPRO
- PP. 11/1/00 Letter from MassPRO to Kelly, November 1, 2000
- QQ. 11/1/00 Letter from MassPRO to Helen Runge

RR. 7/21/01 Runge Letter to MassPro

SS. 10/25/01 Marian Manor Resident Care Plan

TT. 11/08/01 Letter from Runge appointing Kelly as Durable Power of Attorney

UU. 11/27/01 Letter from Kelly to Runge

VV. 12/07/01 Durable Power of Attorney dated 12/7/01

WW. 12/7/01 Declaration Regarding Medical Procedures

XX. 04/26/02 Nova Psychiatric Services Notes

YY. 11/15/02 to 01/07/03 BayView Nurse's Notes

ZZ. 01/09/03 Application Pursuant to M.G.L. c. 123 s. 12(a) for Involuntary Hospitalization

AAA. 01/11/03 Carney Hospital Emergency Dept. Physician Record

BBB. 01/12/03 Application for and Authorization of Temporary Involuntary Hospitalization

CCC. 1/12/03-1/30/03 Notes of Walter Kelly (Kelly Ex. 25)

DDD. 01/14/03 Application for Care and Treatment on a Conditional Voluntary Basis

EEE. 01/15/03 Carney Hospital: Medication Administration Record

FFF. 01/22/03 SB-Randolph Dental Records

GGG. 01/22/03 Carney Hospital: Discharge Instructions and Referral Form

HHH. 01/22/03 Carney Hospital: Psychiatric Discharge Summary

III. 01/23/03 to 05/13/03 Social Progress notes

JJJ. 01/23/03 to 04/02/03 Vital Signs and Weight Chart

KKK. 2/4/03 – 10/3/03 Kelly Invoices

LLL. 02/05/03 Authorization for Services: Meridian Health Associates

MMM. 02/10/03 New England Geriatrics Registration Form

NNN. 02/10/03 New England Geriatrics Assessment

OOO. 02/14/03 Antipsychotic Medication Informed Consent form

PPP. 02/25/03 Meridian Health Associates – Optometry consult

QQQ. 02/27/03 Antipsychotic Medication Informed Consent form

RRR. 03/04/03 New England Geriatrics Diagnostic/Treatment Evaluation

SSS. 3/12/03 Letter from Helen Runge to Walter Kelly

TTT. 03/13/03 New England Geriatrics Treatment Plan

UUU. 03/13/03 New England Geriatrics Diagnostic/Treatment Evaluation

VVV. 03/29/03 Meridian Health Associates – Podiatry notes

WWW. 03/31/03 New England Geriatrics Diagnostic/Treatment Evaluation

XXX. 03/31/03 Meridian Health Associates – Dental care notes

YYY. 3/31/0? SB Antipsychotic Medication Informed Consent

ZZZ. 04/01/03 New England Geriatrics Diagnostic/Treatment Evaluation

AAAA. 04/21/03 New England Geriatrics Diagnostic/Treatment Evaluation

BBBB. 04/22/03 New England Geriatrics Progress Notes

CCCC. 04/29/03 New England Geriatrics Diagnostic/Treatment Evaluation

DDDD. 4/29/03 Fax from Farrah Seidler to Walter Kelly, with letter from Runge revoking Kelly; Durable Power of Attorney for Healthcare 4/29/03; Durable Power of Attorney for Financial Management 4/29/03; Notices of Revocation of Durable Power of Attorney, Healthcare and Document Directing Healthcare all dated 4/29/03

EEEE. 05/02/03 Temporary Decree of Guardianship
FFFF. 05/02/03 Probate Court's Findings of Fact
GGGG. 05/02/03 Bond of Temporary Guardian
HHHH. 5/5/03 Durable Power of Attorney for Financial Management
IIII. 5/6/03 Letter from Schiavoni to Helen Runge
JJJJ. 05/21/03 Department of Public Health Report
KKKK. 5/23/03 Check from Kelly Client's Fund to Meridian Health Associates
LLLL. 8/1/03 Letter from Schiavoni to Hale
MMMM. 8/29/03 Inventory
NNNN. 10/08/03 Psychosocial Assessment – St Luke's Hospital
OOOO. 10/09/03 Psychiatric Assessment – St. Luke's Hospital
PPPP. 11/07/03 Discharge Summary – St. Luke's Hospital

DATED: 6/20/08

Respectfully submitted by,

The Plaintiff,
DOROTHY STANLEY, EXECUTRIX OF THE
ESTATE OF HELEN RUNGE,
By her attorneys,

By /s/ Glenn R. Davis
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